

TO:

Robin L. Blume, Clerk of Court,  
United States District Court for the District of South Carolina, Charleston Federal Courthouse,  
85 Broad Street, Charleston, South Carolina 29401

Paul J. Napoli,  
Esq. Hunter  
Shkolnik, Esq.  
Napoli Shkolnik  
PLLC  
270 Munoz Rivera Ave, Ste 201 Hato Rey, PR 00918

Robert A. Bilott, Esq.  
Taft Stettinius & Hollister LLP 425 Walnut Street, Suite 1800  
Cincinnati, OH 45202-3957

Counsel for Tyco Fire Products LP and Chemguard, Inc.: Joseph G. Petrosinelli,  
Esq. Liam J.  
Montgomery, Esq.

Williams & Connolly, LLP 725 12th Street, N.W. Washington, DC 20005 Counsel for  
ChemDesign Products, Inc.: J. Hayes Ryan, Esq.  
Jonathan B. Blakley, Esq.  
Gordon Rees Scully Mansukhani, LLP 1 N. Franklin Street, Ste. 800 Chicago, IL 60606

Date: May 4, 2021

Re: Objection to Plaintiff attorney(Napoli Shkolnik PLLC, Taft Stettinius & Hollister LLP) fees related to Campbell v. Tyco Fire Products LP Class Action Settlement

I, Dr. Brian E. Bozelka, wish to file an objection to the fairness of the settlement attorney fees in the above named settlement.

I have owned and resided at N2924 Cooke Lane, Marinette, WI 54143 since 2004. Our home is within the Class boundaries as defined by this legal action.

Although this lawsuit was filed December 18, 2018, I have never been contacted by nor directly communicated with the plaintiff's attorneys. My knowledge of this class settlement(\$17.5 million) and our potential inclusion as plaintiffs was realized only within the last few months. Presently, I understand that the attorneys have requested 42% of the settlement(approximately \$7.4 million) as fees, with their specific costs in this case listed at LESS than \$28.000. I would therefore argue that not a great deal of case specific work was completed by the attorneys, and that their risk(fees are contingent) was minimal to justify such a very large /unfair portion of this settlement.

2021 MAY 11 AM 9:14  
CLERK, CHANCERY, SC

I therefore submit that the Class attorneys' fee proposal is outrageous and unfair to all of us named as plaintiffs in this settlement. It significantly and negatively not only impacts the value of this settlement should I remain a plaintiff in this case but more importantly detracts from emotional and physical results of this environmental exposure within our community.

---

  
5/4/2021

TO:

Robin L. Blume, Clerk of Court,  
United States District Court for the District of South Carolina, Charleston Federal Courthouse,  
85 Broad Street, Charleston, South Carolina 29401

Paul J. Napoli,  
Esq. Hunter  
Shkolnik, Esq.  
Napoli Shkolnik  
PLLC  
270 Munoz Rivera Ave, Ste 201 Hato Rey, PR 00918

Robert A. Bilott, Esq.  
Taft Stettinius & Hollister LLP 425 Walnut Street, Suite 1800  
Cincinnati, OH 45202-3957

Counsel for Tyco Fire Products LP and Chemguard, Inc.: Joseph G. Petrosinelli,  
Esq. Liam J.  
Montgomery, Esq. Williams & Connolly, LLP 725 12th Street, N.W. Washington, DC 20005

Counsel for ChemDesign Products, Inc.: J. Hayes Ryan, Esq.  
Jonathan B. Blakley, Esq.  
Gordon Rees Scully Mansukhani, LLP 1 N. Franklin Street, Ste. 800 Chicago, IL 60606

Date: May 4, 2021

Re: Objection to Plaintiff attorney(Napoli Shkolnik PLLC, Taft Stettinius & Hollister LLP) fees related to Campbell v. Tyco Fire Products LP Class Action Settlement

I, Rebecca G. Bozelka, wish to file an objection to the fairness of the settlement attorney fees in the above named settlement.

I have owned and resided at N2924 Cooke Lane, Marinette, WI 54143 since 2004. Our home is within the Class boundaries as defined by this legal action.

Although this lawsuit was filed December 18, 2018, I have never been contacted by nor directly communicated with the plaintiff's attorneys. My knowledge of this class settlement(\$17.5 million) and our potential inclusion as plaintiffs was realized only within the last few months. Presently, I understand that the attorneys have requested 42% of the settlement(approximately \$7.4 million) as fees, with their specific costs in this case listed at LESS than \$28,000. I would therefore argue that not a great deal of case specific work was completed by the attorneys, and that their risk(fees are contingent) was minimal to justify such a very large /unfair portion of this settlement.

I therefore submit that the Class attorneys' fee proposal is outrageous and unfair to all of us named as plaintiffs in this settlement. It significantly and negatively not only impacts the value

2021 MAY 11 AM 9:14  
CLERK OF COURT  
CLERK OF COURT  
CLERK OF COURT

of this settlement should I remain a plaintiff in this case but more importantly detracts from emotional and physical results of this environmental exposure within our community.

5-4-21  
Rebecca C. Byelka